



E Street Communications, Inc.
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**** Certificate of Compliance CPNI ****

As a corporate officer of E Street Communications, Inc. (the Company), I hereby certify that based on my personal knowledge, the Company is in compliance with the rules established by the Federal Communications Commission (FCC) concerning the permissible use of Customer Proprietary Network Information (CPNI), specified in Section 64 of the FCC's rules, 64 C.F.R. as described below.

Permissible Uses of CPNI Without Customer Approval:

1. Unless it first obtains a customer's approval, the Company only uses, discloses, or permits access to its customer's CPNI in order to provide or market service offerings among categories of service to which the customer already subscribes. In addition, the Company acknowledges that:
 - a. If a customer subscribes to more than one category of service offered by the Company, the Company may share the customer's CPNI with its affiliates that provide services to the customer;
 - b. If a customer subscribes to only one of several categories of service offered by the Company, then the Company does not share the CPNI with its affiliates; and
2. The Company does not use, disclose or permit access to CPNI to market service offerings to a customer that is within a category of service to which the customer does not already subscribe from the Company unless the Company has customer approval to do so, except as follows:
 - a. The Company does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.
3. The Company understands that it may use, disclose or permit access to CPNI in the following instances without obtaining customer approval:
 - a. Providing inside wiring installation, maintenance and repair services; and
 - b. To market information services and equipment necessary to, or used in, the provision of telephone service (such as telephones and caller ID units, internet, voice mail, etc.).

Notice and Approval Required for CPNI Use:

- 1) The Company understands that it must obtain customer approval to use, disclose, or permit access to CPNI to market services that are not within a category of services to which that customer already subscribes.
- 2) The Company may obtain such approval through oral, written or electronic methods.
- 3) If the Company relies on oral approval, it understands that it bears the burden of demonstrating that such approval has been given in compliance with FCC rules.
- 4) Approval obtained by the Company for the use of CPNI outside the customer's total service relationship with the Company remains in effect until the customer revokes or limits such approval.

- 5) The Company maintains records of notification and approval, whether oral or electronic, for at least one year.
- 6) Prior to any request for customer approval, the Company provides a one-time notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. The Company acknowledges that:
 - a) Such notification is provided either by oral or written methods;
 - b) Such customer notification provides sufficient information to enable the customer to make an informed decision as to whether to permit the Company to use, disclose or permit access to the customer's CPNI;
 - c) The notification states that the customer has a right, and the Company a duty, under federal law to protect the confidentiality of CPNI;
 - d) The notification specifies the types of information that constitute CPNI and the specific entities that will receive the CPNI, describes the purposes for which CPNI will be used, and informs the customer of his or her right to disapprove those uses, and denies or withdraws access to CPNI at any time;
 - e) The notification advises the customer of the precise steps the customer must take to grant or deny access to CPNI, and clearly states that a denial of approval will not affect the provision of any services to which the customer subscribes;
 - f) The notification is comprehensible and is not misleading;
 - g) If written notification is provided, the notice is clearly legible, uses sufficiently large type, and is placed in an area of the document so as to be readily apparent to a customer;
 - h) If any portion of a notification is translated into another language, then an portions of the notification are translated into that language;
 - i) The Company may state in the notification that the customer's approval to use CPNI may enhance the Company's ability to offer products and services tailored to the customer's needs. The Company also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer;
 - j) The Company does not include in the notification any statement attempting to encourage a customer to freeze third party access to CPNI;
 - k) The notification states that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes to from the Company is valid until the customer affirmatively revokes or limits such approval or denial;
 - l) The Company's request for approval is proximate to the notification of a customer's CPNI rights; and
 - m) The Company's request for approval, if written, is not on a document separate from the notification, even if such document is included within the same envelope or package.

Information Required Prior to Use of CPNI:

- 1) The Company acknowledges the FCC's requirement that carriers must develop and implement software that indicates within the first few lines of the first screen of a customer's service record their CPNI approval status, as well as reference the customer's existing service subscription.
- 2) The Company acknowledges the FCC's requirement that telecommunications carriers must train their personnel as to when they are and are not permitted to use CPNI, and that carriers must have an express

disciplinary process in place in case of a breach of these standards.

- 3) The Company acknowledges the FCC's requirement that telecommunications carriers need only maintain a record of their sales and marketing campaigns that use CPNI
- 4) The Company acknowledges the FCC's requirement that telecommunications carriers must establish a supervisory review process to monitor the compliance of its outbound marketing operations with the FCC's CPNI rules. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request. Per the FCC's rules, the Company will maintain records of its compliance with this requirement for a minimum period of one year.
- 5) **Over the past year, the Company has not initiated any investigations regarding the unauthorized disclosure or access to CPNI by data brokers. Also, over the past year, the Company has not received any customer complaints regarding the unauthorized release of CPNI.**

In addition to the foregoing acknowledgments, and incorporated as part of this certification, attached is a statement explaining the office procedures or other programs the Company is using to comply with the Commission's restrictions on the use of CPNI (such as distinguishing the CPNI of customers who have not consented to the Company's use of this information for marketing purposes). I hereby certify that the statements contained within this certification and within its incorporated compliance statement are accurate and complete to the best of my ability.



Nick Voth, President
E Street Communications, Inc.

2/23/18

Date